

EXHIBIT 11

Barbara Brown

10/11/2006

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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IAN BROWN, JAMES BROWN and
BARBARA BROWN,

Plaintiffs,

-against- Civil Action
No. 04civ1192-RGS

UNITED STATES OF AMERICA, VERIZON
NEW ENGLAND, INC., and BOSTON
EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

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October 11, 2006
9:48 a.m.

Deposition of BARBARA BROWN, taken by the
Defendants, pursuant to notice, held at
Manheimer & Charnas LLP, 747 Third Avenue,
New York, New York, before Tracy Eckhoff, a
Shorthand Reporter and Notary Public within and
for the State of New York.

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2 Q. And these are your answers to
3 Verizon's first set of interrogatories?

4 A. Correct.

5 Q. Could you turn to the second page,
6 and I'll direct your attention to Interrogatory
7 No. 4, and the last sentence of your answer reads,
8 We also had to take a home equity line of \$24,000
9 for making our home accessible, constructing deck
10 with ramps and widening our driveway to
11 accommodate chair and cars.

12 Those are expenses you incurred in
13 making your home accessible for Ian; is that
14 right?

15 A. Yes.

16 Q. And you took a home equity line of
17 credit to do that?

18 A. Yes.

19 Q. Now, it was your understanding that
20 from the settlement you pocketed or you wound up
21 with about 178,000 and then you -- and that was in
22 2001, and then in 2002, I believe you said, you
23 purchased -- 2001 you also purchased the home in
24 Neptune?

25 A. Yes.

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A. That 24,000 home equity is included in our debt.

Q. Perhaps I didn't ask my last question right. Do you know how much is remaining to be paid down on the home equity line?

A. No.

Q. Do you know what your monthly payment is on that?

A. An approximate?

Q. Yes.

A. Between 250 and 300 dollars.

Q. In addition -- other than the home equity line, have you incurred any other debt in order to make the home accessible for Ian?

A. Yes.

Q. And how much, approximately?

A. A best guess estimate would probably be about three to 5,000, I would imagine.

Q. And is that credit card debt?

A. The improvements were put on credit cards.

Q. And what were those improvements?

A. The house that we purchased had two very small bathrooms. The second bathroom

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2 adjacent to our washing machines was very tight
3 and narrow. They had to be expanded to allow
4 Ian -- to accommodate him in his wheelchair for
5 showering and bathroom purposes. There were
6 renovations made to accommodate the chair in that
7 bathroom.

8 **Q. Now, it says in Interrogatory No. 4**
9 **that you -- that there was a loss of personal sick**
10 **and vacation time for Barbara Brown.**

11 **You exhausted your personal sick and**
12 **vacation time?**

13 A. Yes.

14 **Q. Now, it says that \$450 per week for**
15 **the year of 2002 at five weeks.**

16 **What were the five weeks' vacation**
17 **that you took off? Was that immediately after the**
18 **accident?**

19 A. They began on the day of the
20 accident.

21 **Q. And did you take five weeks off at**
22 **one -- in one chunk of time?**

23 A. Yes.

24 **Q. Okay.**

25 **And then did you have to return to**

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A. I'm sorry, Josh. Again.

Q. Sorry.

Do you know if Ian has been exploring
living on his own outside of your house?

A. I do not know.

Q. Did you receive any money -- or did
Ian contribute any money for the modifications you
made to your home?

A. No.

Q. Are you aware that Ian at one point
in his lifetime will have provided to him by the
federal government the expense necessary to
retrofit a residence for him?

A. The question again, Josh. I'm sorry.

Q. It was terrible.

A. No. No.

Q. Are you aware that the federal
government will provide to Ian the expenses
necessary to retrofit a residence for him?

A. For Ian?

Q. Yes.

A. I believe so.

Q. Do you know if Ian has any plans to
take advantage of that?

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2 MS. JOHNSON: Thank you.

3 THE WITNESS: You're welcome.

4 MR. CHARNAS: Two minutes is all I
5 need.

6 (A recess was taken.)

7 EXAMINATION BY MR. CHARNAS:

8 Q. Mrs. Brown, how much in total,
9 approximately, does Ian contribute on a monthly
10 basis to the household?

11 A. My best guess estimate would probably
12 be between about 550 and maybe 650 dollars.

13 Q. Per month?

14 A. Per month.

15 Q. Did Ian ever reimburse you for the
16 expenses of improving the house and property to
17 make it more handicap accessible?

18 A. No.

19 Q. Do you have a land-line telephone in
20 your house?

21 A. I do.

22 Q. Does Ian ever use that telephone?

23 A. Yes.

24 Q. Does Ian pay for that telephone?

25 A. No.